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11 Attorneys for Defendant  
12 PODS, Inc.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 ISAAC TANNER,

16 Plaintiff,

17 vs.

18 PODS, INC., et al.,

19 Defendants.

Case No. C07-02392 JL

**DEFENDANT'S OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
SANCTIONS/ATTORNEYS' FEES**

Date: July 11, 2007  
Time: 9:30 a.m.  
Courtroom: F, 15th Floor

Hon. James Larson

20 As noted in Defendant's Opposition to Plaintiff's Motion to Remand, Defendant's Notice  
21 of Removal was timely filed. Accordingly, Plaintiff's Motion for Sanctions/Attorneys' Fees  
22 should be denied.

23 DATED: June 19, 2007

REED SMITH LLP

24 By 

25 Ian P. Fellerman  
26 Attorneys for Defendant  
27 PODS, Inc.  
28

**PROOF OF SERVICE**

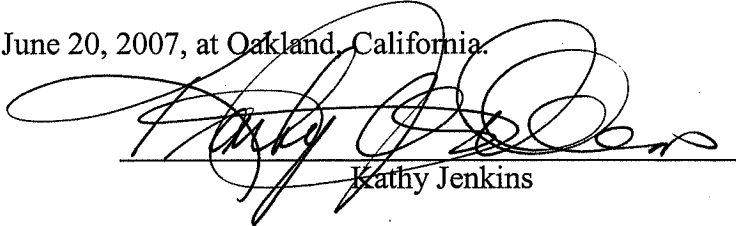
I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is REED SMITH LLP, 1999 Harrison Street, Suite 2400, Oakland, CA 94612-3572. On June 20, 2007, I served the following document(s) by the method indicated below:

**DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS/ATTORNEYS' FEES**

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Oakland, California, addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.

M. Van Smith  
1696 Mendenhall Drive  
San Jose, CA 95130  
(408) 364-1062 (T)  
(408) 273-6496 (F)

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on June 20, 2007, at Oakland, California.



Kathy Jenkins

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